

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Cause No. 4:14CR00361CDP/NAB</b>
<b>vs.</b>	)	
	)	
<b>SHOICHI OKADA,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S REQUEST FOR EXTENSION OF TIME  
TO FILE PRE-TRIAL MOTIONS**

Comes now, Counsel for Defendant, and respectfully requests a forty-five day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged by indictment with one count of Possession of Child Pornography.
2. The Government’s investigation of this case involved forensic evaluation of various computers and hard drives.
3. Counsel has received an initial packet of discovery, as well as, supplemental discovery from the Government. Counsel has diligently reviewed the discovery provided, which includes an audio statement, police reports, a search warrant, and computer analysis reports.
4. This case has a number of complex computer and legal issues. Counsel needs more time to investigate and research the relevant issues.
5. Counsel needs more time to evaluate and review the evidence to determine if filing motions is necessary in this case.

6. Counsel has discussed this request for an extension of the date for filing pretrial motions with the Assistant United States Attorney, Rob Livergood, and he has no objection to the extension.

7. It is Counsel's understanding that a trial date has not been set for the cause.

8. Counsel is filing a Waiver of Speedy Trial signed by Defendant.

9. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(8).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests an extension of the deadline for forty-five days to file pre-trial motions and a continuance of the motion hearing date.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,  
ATTORNEYS AT LAW, P.C.

By: /s/ Daniel A. Juengel  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Rob Livergood  
United States Attorney  
111 South Tenth Street  
St. Louis, Missouri, 63102.

/s/ Daniel A. Juengel  
DANIEL A. JUENGEL